

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

MARTIN GOTTESFELD,

Defendant.

Crim. No. 16-CR-10305-NMG

MOTION TO PREVENT PARTY CONTACT WITH JURORS

The United States respectfully moves the Court to order that neither the Defendant nor anyone acting on his behalf, including his wife, Dana Gottesfeld, contact any juror, pursuant to *United States v. Kepreos*, 759 F.2d 961, 967 (1st Cir. 1985) (“We start with the proposition that henceforth this Circuit prohibits the post-verdict interview of jurors by counsel, litigants or their agents except under the supervision of the district court, and then only in such extraordinary situations as are deemed appropriate. Permitting the unbridled interviewing of jurors could easily lead to their harassment, to the exploitation of their thought processes, and to diminished confidence in jury verdicts, as well as to unbalanced trial results depending unduly on the relative resources of the parties.”).

Given the frequent attempts by Dana Gottesfeld to contact others on the Defendant's behalf, inclusion of Ms. Gottesfeld in such an order is appropriate.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ David J. D'Addio
DAVID J. D'ADDIO
SETH B. KOSTO
Assistant U.S. Attorneys

Date: August 1, 2018

Certificate of Service

I hereby certify that, on this date, this document will be sent electronically to David Grimaldi, Esq., counsel to defendant Martin Gottesfeld.

/s/ David J. D'Addio
Seth B. Kosto
David J. D'Addio
Assistant U.S. Attorneys

Date: August 1, 2018